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July 26, 1994

Mr. Donald L. Averett
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: National Right to Life Political Action Committee
April Quarterly Report
(1/1/94-3/31/94)
RQ-2

Dear Mr. Averett:

As general counsel for the National Right to Life Political Action Committee (NRLPAC), I have been asked to respond to your letter of June 24, 1994, regarding reporting of independent expenditures.

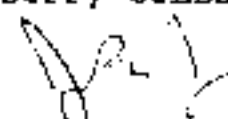
On Schedule E of our quarterly report, NRLPAC reported certain independent expenditures for "payroll, salary, transportation, meals, lodging, copy, office space and hotel." You ask for clarification on whether these payments were independent expenditures or in-kind contributions.

NRLPAC made independent expenditures in the races we reported on Schedule E. In order to conduct these independent expenditures, NRLPAC paid persons a salary for their services and reimbursed their expenses. These expenditures were not communicated to the candidate involved and thus were independent.

If you have further questions, please advise.

Sincerely,

BOPP, COLESON & BOSTROM


James Bopp, Jr.

Federal Election Commission
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J.A.O.
PREPARER

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